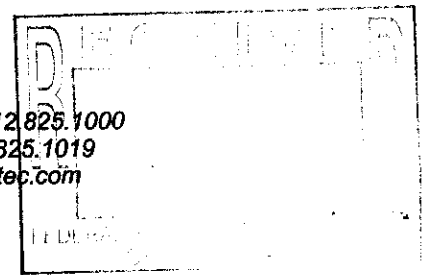




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November 4, 2008

Mr. Grady C. Cothen Jr.
Deputy Associate Administrator for Safety Standards & Program Development
Federal Railway Administration
West Bldg 3rd Fl Mail Stop #25
1200 NJ Ave., SE
Washington, DC 20593

RE: FRA Waiver – 2002 – 13397

Dear Mr. Cothen:

Westinghouse Air Brake Technologies (Wabtec) respectfully requests modification of FRA Waiver 2002 – 13397 transmitted via your letter of February 1, 2005. The specific section requesting modification is condition (6) defined as; *the brake pipe vent valves shall be cleaned, repaired and tested at a minimum of every 368 calendar days*. Granting of this request will allow the brake pipe vent device consistent maintenance intervals with the EPIC and FastBrake electronic air brake equipment covered under the referred waiver.

The basis for this request is the vigilance capability integrated into Wabtec's electronic air brake equipment. This vigilance feature employs the controlling computer circuitry to constantly monitor for proper functioning of the individual components of the system. If key parameters are found to be outside the allowable tolerance established, an automatic and immediate action is taken to insure safe operation of the equipment. While the auxiliary brake pipe vent device is not an integrated part of the EPIC or FastBrake electronic system, both electronic systems incorporate vigilance logic that constantly monitor for proper functioning of the brake pipe and take action if an abnormal operation occurs. Both the EPIC and FastBrake systems provide an additional means to vent brake pipe at an emergency rate of reduction that acts independently of the remote mounted venting devices. This constant monitoring and parallel brake pipe control along with the fact that the current standard brake pipe vent device has been in use on virtually all new locomotives produced since 1995, is used in brake systems manufactured by both major brake system manufacturers and has provided many years of problem free operation on railroads world wide drives us to request this waiver modification.

Wabtec believes the current 368 day maintenance interval on brake pipe vent devices used on electronic air brake equipped locomotives is unnecessary and requests that condition (6) of FRA Waiver 2002 – 13397 be changed to allow a consistent maintenance interval with the EPIC & FastBrake brake equipment.

Wabtec respectfully requests and thanks you for your attention in this matter. Please feel free to contact me should you have any questions or require additional information.

Regards,

Robert D. Dimsa
Vice President & General Manager
WABCO Locomotive Products
A Wabtec Company

Cc: James Wilson FRA

RDD/jyb

